



May 17, 2024

Ms. Nancy Marconi
Registrar
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Re: EB-2024-0126 Transmission Connections Review
AMPCO Comments on Issues to be Considered

Dear Ms. Marconi:

The OEB is undertaking a review of the connection-related sections of the Transmission Systems Code (TSC) to enhance the effectiveness of connection processes, procedures, and requirement. As the connection of new loads and supply resources including energy storage increases, the OEB wants to ensure that the regulatory rules associated with connections in the TSC facilitate and enable those connections.

The TSC sets out the requirements, standards, terms, and conditions of a transmitter's obligations to connect consumers to the transmission system, including performance standards, technical requirements and expansions and connections. Following input from stakeholders, the OEB has identified several possible issues that may be addressed in this review:

- Sector changes and new demands mean that another review of cost allocation and recovery policies, such as the economic evaluation methodology for new or modified load connections, is prudent.
- Energy storage is not addressed in the TSC, for example there is no standardized connection agreement for energy storage in Appendix One.
- The OEB's review process for transmitter connection procedures is not specified, and there is no minimum review frequency.

The OEB is seeking input from stakeholders on the issues that this Transmission Connections Review should consider. After reviewing stakeholder comments, the OEB will produce an issues list and a plan to engage with stakeholders on addressing the issues.

AMPCO agrees that the above issues should be considered, particularly another review of cost responsibility and economic evaluation methodology for new connections (Appendix 5). Currently the economic evaluation period is determined based on the risk classification of the proposed new or modified connection as determined by the transmitter in accordance with Appendix 4. As part of this

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issue, AMPCO suggests Appendix 4: Customer financial risk classification, be reviewed to determine if any modifications are required. The transmitter must include its risk classification methodology in its economic evaluation procedure and that methodology must meet certain criteria and be consistent with the recommendations contained in a Report to the OEB on Risk Assessment Methodology Options dated March 30, 2000, prepared by PHB Hagler Bailly. The continued validity of this report should be assessed, in the context of changes in the sector and the connection of new loads and supply resources.

The information made available to customers by transmitters (Appendix 3) may be impacted by sector changes and in AMPCO's view this issue should be added.

Lastly, the extent to which new types of connections impact current transmission system connection point performance standards should be considered as an issue.

Best Regards,

A handwritten signature in cursive script that reads "Shelley Grice".

Shelley Grice
Consultant
c/o AMPCO